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DECEDENTS' ESTATES—LANDS—LIABILITY FOR COSTS OF ADMINISTRATION.—The lands of an intestate are held, in *Carr v. Hull* (Ohio), 58 L. R. A. 641, not to be subject to sale to pay the costs of administration alone, though subject to the payment of his debts and the year's allowance to the widow and minor children, in case the personalty is insufficient, and charges of administration incident to the sale of the land.

STREET RAILWAYS—CONTINUED RINGING OF GONG.—If one in charge of an electric car, seeing that a horse is frightened by the approach of the car, and that its driver is in danger, continues to sound the gong or ring the bell, and further frightens the horse and causes it to run away, the car company is held, in *Oates v. Metropolitan Street Ry. Co.* (Mo.), 58 L. R. A. 447, to be liable for the injuries thereby caused to the driver.

NUISANCES—ESTOPPEL—RENEWAL OF LEASE.—The renewal by a tenant of his lease after the creation by a third person of a nuisance by his method of conducting his business, injuriously affecting the right of occupancy and the tenant's private property, is held, in *Bly v. Edison Electric Illum. Co.* (N. Y.), 58 L. R. A. 500, not to preclude the tenant from maintaining an action to abate the nuisance and to recover the damages for his injuries.

EQUITY JURISDICTION—SUIT TO ENJOIN DIVORCE PROCEEDINGS IN ANOTHER STATE.—A husband and wife having their matrimonial domicile in the State, and the domicile of the wife being also there, it is held, in *Kempson v. Kempson* (N. J. Err. & App.), 58 L. R. A. 484, that the court of chancery, on a bill filed by the wife, has jurisdiction to enjoin the husband from prosecuting a suit for divorce in another State, the jurisdiction of which he had invoked on a false and fraudulent allegation of his residence in that State.

WATER RIGHTS—TENANTS IN COMMON—GRANT.—A sale of his interest by one tenant in common of a mill to the other is held, in *Cox v. Howell* (Tenn.), 58 L. R. A. 487, to carry the appurtenances necessary to its operation as they existed when the sale was made, and to prevent his subsequently withdrawing water from the stream, for manufacturing purposes on his own land, to the injury of the mill.

With this case is a note on how far grant of mill includes water rights.

CORPORATIONS—CAPITAL AND FRANCHISES—TAXATION.—For the purpose of ascertaining the value of the capital and franchises of a corporation for purposes of taxation, it is held, in *State Board of Equalization v. People ex rel. Goggin* (Ill.), 58 L. R. A. 513, that the market value of the capital stock and the fair cash value of the bonded indebtedness may be added, and the value of the tangible property deducted from the amount.

An extensive note to this case reviews the other authorities on taxation of capital stock of corporations in the United States.

HOMESTEAD—RIGHTS OF WIDOW AND CHILDREN.—Section 3635 of the Code of Virginia provides that the real estate set apart by a householder in his life-time